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April 18, 2006

06-4-3

4/20/06

Clerk of the Board
Air Resources Board
1001 I Street
Sacramento, CA 95814

Subject: Draft Emission Reduction Plan for Ports and International Goods
Movement in California

TO: Clerk of the Board

On February 27, 2006 the Port of San Diego (Port) submitted comments to the California Air Resources Board (CARB) on CARB's Draft Emission Reduction Plan for Ports and International Goods Movement in California (ERP). By way of this letter, the Port is resubmitting these comments (Attachment) in response to (CARB's) final ERP.

We continue to be concerned about the wording of the ERP proposal to reduce statewide emissions to 2001 levels by 2010 in order to mitigate for the impacts of growth. In conversations with several CARB staff members, we have been advised that the intent of this language was not to require each California port, and other specified entities, to reduce its emissions to 2001 levels. Instead, we have been told that this would be a statewide goal. Unfortunately, the actual language used does not make this clear. As we stated in our February 27, 2006 submittal, the application of a 2001 standard to the Port of San Diego is inappropriate since the growth of our marine shipping operations did not begin to emerge until 2005. We request that the ERP be modified to allow the Port of San Diego, and other smaller ports, to be treated on a case-by-case basis, thereby correctly reflecting CARB's intended approach.

If you have any questions, please feel free to contact me at 619-686-7239.

Sincerely,

A handwritten signature in black ink, appearing to read "David Merk".

David Merk, Director
Environmental Services

DM:LM:jh
Attachment: CARB Letter dated 2/27/2006
File: CARB
Docs #165751 v4



Unified Port
of San Diego

February 27, 2006

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Ms. Sylvia Oey
PTSD
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: Comments on California Air Resources Board Draft Emission Reduction Plan for Ports and International Goods Movement in California.

Dear Ms Oey:

The Port of San Diego (Port) is pleased to submit comments on the California Air Resources Board (CARB) Draft Emission Reduction Plan (ERP) for Ports and International Goods Movement in California (12/1/05). The Port appreciates the opportunity to provide comments and recognizes the tremendous efforts by CARB staff to draft this plan, especially with respect to the short time frame provided for completion.

The ERP's proposal to reduce statewide emissions to 2001 levels by 2010 in order to mitigate for the impacts of growth is a laudable goal. The Ports of Los Angeles and Long Beach have extensive data on port-related emissions and using 2001 to benchmark their baseline may be appropriate. However, the application of a 2001 standard to the Port of San Diego is inappropriate since the growth of our marine shipping operations did not begin to emerge until 2005 (Appendix A). The Port of San Diego will be adversely impacted if we are required to reduce our emissions to the 2001 levels by 2010. We believe, due to our relatively small size compared to the Ports of Los Angeles, Long Beach and Oakland, that achieving the emission reduction goal of 2001 levels will not be compromised statewide if the Port of San Diego is benchmarked to a year subsequent to 2005.

We respectfully recommend that the Port of San Diego emissions baseline and that of other small ports be approached on a case-by-case basis to adjust for emerging growth subsequent to the year 2001. We also encourage CARB to utilize its 2005 land use handbook as a way to help encourage establishment of buffer zones between essential goods movement areas and sensitive receptors. Land use decisions will be critical in providing citizens a healthy environment.

The Port of San Diego commends CARB for its continuing efforts to provide the citizens of California with healthy air quality as well as an economically sustainable environment.

Sincerely,


David Merk, Director
Environmental Services

DM:LM:rg
Attachment: Appendix A
Docs #170080

San Diego Unified Port District

Appendix A

Table 1
Annual Cruise Ship Visits @ the Cruise Ship Terminal

Year	Number of Cruise Ships
2001	45
2002	122
2003	127
2004	188
2005	219

Table 2
Annual Cargo Vessel Visits for NCMT and TAMT

Year	Containers	Bulk	Breakbulk	RoRo	Total
2001	0	57	68	177	302
2002	0	29	61	169	259
2003	47	19	59	138	263
2004	50	22	55	139	266
2005	52	31	87	165	335
5 years	149	158	330	788	1425

TEUs for the Ports for 2004

Port	2004 Twenty-foot Equivalent Units (TEUs,000)
Port of Los Angeles	7,320
Port of Long Beach	5,779
Port of Oakland	2,043
Port of San Diego	92